

## **EXHIBIT C**

**From:** [Sloniewsky, Andrew](#)  
**To:** [Jonathan Kelley](#); [Theodore, Jeffrey](#); [Porter, Katherine](#)  
**Cc:** [Agusti, Fil](#); [hockeimerh@ballardspahr.com](mailto:hockeimerh@ballardspahr.com); [grugant@ballardspahr.com](mailto:grugant@ballardspahr.com); [Jeremy Fielding](#); [Kent Krabill](#); [Petts, Nick](#); [Julie Negovan](#); [Zensky, David](#); [Dailey, Jeffery](#); [Sorkin, Joseph L.](#)  
**Subject:** RE: Eddystone v. Bridger - Call to discuss Rios/Gamboa RFP responses  
**Date:** Wednesday, October 11, 2017 2:49:08 PM

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Counsel:

This describes the meet-and-confer that the Eddystone and Rios/Gamboa ("R/G") had early today regarding Eddystone's requests for production ("RFPs"), and R/G's revised objections to those RFPs which R/G provided moments before our call. This email focuses principally on the parties' discussion regarding time limits for the RFPs, as that is an issue raised in the outstanding motion to compel:

Eddystone and R/G have no agreement on time limits for the following Eddystone RFPs:

RFPs 6-8, 11, 12, 17, 20-21, 29-32, 34, 40, 52-54 (R/G to consider 1/1/12-12/31/16), 57, and 58.

For the following RFPs, R/G (a) agreed to the time limit as written in the RFPs, (b) agreed during the call to the specified time limit, or (c) have no documents:

RFPs 1 (as written), 2-3 (1/1/12-3/1/16), 4-5 (as written), 9 (as written), 10 (6/1/15-11/28/16), 13-16 (no documents), 18-19 (no documents), 22-23 (no documents), 24-26 (as written), 27 (no documents), 28 (12/31/14-3/1/16), 33 (no documents), 35 (no documents), 36 (1/1/12-3/1/16), 37 (1/1/12-4/1/13), 38-39 (1/1/12-3/1/16), 41-43 (1/1/12-3/1/16), 44 (as written), 45 (1/1/12-3/1/16), 46 (no documents), 47-50 (1/1/12-3/1/16), 51 (as written), 55-56 (1/1/12-3/1/16), 59 (as written), 60 (no documents).

As I indicated during the call, all agreements by Eddystone are without prejudice to it serving any additional document requests, including additional requests for the periods before 1/1/12.

Let me know if you have any questions regarding the foregoing, or if the foregoing seems incorrect to you in any way.

Regards,

Andrew

**Andrew J. Sloniewsky**  
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**From:** Jonathan Kelley [mailto:[jkelley@lynnllp.com](mailto:jkelley@lynnllp.com)]  
**Sent:** Wednesday, October 11, 2017 11:55 AM  
**To:** Theodore, Jeffrey; Porter, Katherine  
**Cc:** Agusti, Fil; Sloniewsky, Andrew; [hockeimerh@ballardspahr.com](mailto:hockeimerh@ballardspahr.com); [grugant@ballardspahr.com](mailto:grugant@ballardspahr.com); Jeremy Fielding; Kent Krabill; Petts, Nick; [jnegovan@griesinglaw.com](mailto:jnegovan@griesinglaw.com); Zensky, David; Dailey, Jeffery; Sorkin, Joseph L.  
**Subject:** RE: Eddystone v. Bridger - Call to discuss Rios/Gamboa RFP responses

All,

For informational purposes for today's call, please see attached for a revised draft of Rios and Gamboa's RFP responses.

Thanks,  
Jon

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**From:** Jonathan Kelley  
**Sent:** Wednesday, October 11, 2017 10:11 AM  
**To:** 'Theodore, Jeffrey' <[jtheodore@step toe.com](mailto:jtheodore@step toe.com)>; Porter, Katherine <[kporter@akingump.com](mailto:kporter@akingump.com)>  
**Cc:** Agusti, Fil <[FAgusti@step toe.com](mailto:FAgusti@step toe.com)>; Sloniewsky, Andrew <[ASloniewsky@step toe.com](mailto:ASloniewsky@step toe.com)>; [hockeimerh@ballardspahr.com](mailto:hockeimerh@ballardspahr.com); [grugant@ballardspahr.com](mailto:grugant@ballardspahr.com); Jeremy Fielding <[jfielding@lynnllp.com](mailto:jfielding@lynnllp.com)>; Kent Krabill <[kkrabill@lynnllp.com](mailto:kkrabill@lynnllp.com)>; Petts, Nick <[npetts@Step toe.com](mailto:npetts@Step toe.com)>; [jnegovan@griesinglaw.com](mailto:jnegovan@griesinglaw.com); Zensky, David <[dzensky@AkinGump.com](mailto:dzensky@AkinGump.com)>; Dailey, Jeffery <[JDailey@AKINGUMP.com](mailto:JDailey@AKINGUMP.com)>; Sorkin, Joseph L. <[jsorkin@AkinGump.com](mailto:jsorkin@AkinGump.com)>  
**Subject:** Eddystone v. Bridger - Call to discuss Rios/Gamboa RFP responses

All,

For our call today at noon EST, let's use the below dial-in information:

Dial-in: 1-800-504-8071  
Access code: 7888451

We will send a draft of our amended responses to Eddystone's RFPs shortly.

Thanks,

Jon

**JON KELLEY**, Attorney  
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